

14-3-2

CAPRICE ENTERPRISES, INC.

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TELEPHONE (310) 450-2075

April 23, 2014

Re: Proposed Amendments to the Truck and Bus Regulation

Dear California Air Resources Board:

I operate a small California-based business with two heavier diesel-powered trucks. As my trucks average 2,200 miles each per year in California, the original 1,000 mile low-use exemption did not apply to me. As such, I bit the bullet, searched for, and in October 2013 purchased two newer 2009 model year trucks to replace my older trucks and went to bed happy that I was going to be in compliance with the regulations.

However, upon waking, I discover CARB has proposed modifications to the regulations that will expand the low use exemption to 5,000 miles per year, good until 2020. I would have fallen squarely within this expanded exemption and would not have had to upgrade my trucks until 2020. Please bear in mind there was nothing wrong with my original trucks as they were well maintained and regularly passed every roadside inspection as well as the required annual smoke opacity tests. Also, my newer trucks are good only until 2023, at which time I will have to replace them again assuming I survive and am still in business at that time.

I am in favor of expanding the low use exemption. However, those who in good faith tried to comply with the law are being punished, and harshly. Personally, I am being punished to the tune of almost \$90,000 and will continue to be punished with higher vehicle registration fees for the life of the newer trucks. In addition, to comply with the regulation as written, I will have to purchase yet another set of trucks by 2023, while others will only have to purchase one set of trucks by 2020. To pay for these trucks I reluctantly had to eliminate one employee position that has created additional hardships for my company. To add insult to injury, because of my low use in the state I was not eligible for any grant money set aside for small fleets such as mine to comply with the regulations despite my tax dollars funding such grants. The playing field seems far from level.

Equity demands some relief for those who in good faith spent or worse were forced to borrow a great deal of money to comply with a regulation only to have the goalposts moved dramatically closer at the last minute. As the expanded low use exemption will grant an extra seven years of life to trucks traveling less than 5,000 miles annually, I respectfully request a similar seven year extension be added for 2007 – 2009 year model engine trucks traveling 5,000 miles or less to the January 1, 2023 date by which these trucks would otherwise have to be replaced, i.e., extend this deadline to January 1, 2030 for those 2007-2009 model year engine trucks traveling 5,000 miles or less per year.

Thank you for your consideration.

Very truly yours,

Bruce Perelman
Caprice Enterprises, Inc,